

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

SECURITIES AND EXCHANGE COMMISSION,)
Plaintiff,)
v.) Case No.
BARRY C. HONIG, ROBERT LADD, ELLIOT) 18 Civ. 8175(ER)
MAZA, BRIAN KELLER, JOHN H. FORD,)
GRQ CONSULTANTS, INC., AND HS)
CONTRARIAN INVESTMENTS, LLC,)
Defendants.)
_____)

VOLUME 1
VIDEOTAPED DEPOSITION OF TARA GUARNERI-FERRARA
VIA VIDEOCONFERENCE
Tuesday, July 12, 2022

Diversified Reporting Services, Inc.
(202) 467-9200

1 **Q Did 13(d) ever come up in any of those**
2 **transactions that you worked on for Mr. Barry Honig?**

3 A Well, they certainly made 13(g) and (d) filings
4 where appropriate.

5 **Q Did any issues arise in connection with those**
6 **filings?**

7 MR. RASTOGI: So I just -- I understand that
8 this is a general question, and therefore, Tara can
9 answer it. I just want to caution the witness that if
10 you are going to raise a specific issuer that's not MGT,
11 those issuers or that client potentially has privilege
12 issues. So try to keep your answers general to the
13 extent you can, if you remember, and just try to be
14 mindful of that.

15 A Can you repeat the question? I'm sorry.

16 **Q Sure. In connection with working on transactions**
17 **that involved Mr. Barry Honig, do you recall there being**
18 **issues in connection with filing 13(d)s or 13(g)s on his**
19 **behalf?**

20 A I don't recall any issues.

21 **Q Did you ever have a situation where you had a**
22 **discussion with anyone at Sichenzia about the group**
23 **status of Mr. Honig?**

24 A I don't recall having a discussion, no.

25 **Q So when was your first introduction to MGT or**

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1 **Mr. Ladd ever asking you about any filings on behalf of**
2 **Mr. Honig for MGT shares?**

3 A Correct.

4 Q **In whatever work Sichenzia did to prepare or**
5 **review the Schedule 13(g) for Mr. Honig, who was the**
6 **client?**

7 A Again, I don't recall, because typically with
8 Section 16 filings or -- or ownership filings, you could
9 do it on behalf -- as a courtesy for the company who
10 prepares them.

11 So it depends on -- it would depend on
12 the partner whose relationship it was to kind of say
13 what the arrangement was. I don't specifically recall
14 who we -- who was represented.

15 Q **And your use of the word company in that answer**
16 **refers to the issuer?**

17 A Correct.

18 Q **So in preparing a Schedule 13(g) for Honig, it**
19 **may be that you were actually preparing it for the**
20 **issuer?**

21 A No, no, no.

22 I just mean that we would prepare
23 filings related to the issuer for either Section 16
24 filings for directors or officers or 13 -- or for
25 shareholders that had to file. Again, but I -- you